

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE; DR.
ANDREA WESLEY; DR. JOSEPH WESLEY;
ROBERT EVANS; GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA SMITH;
DEBORAH HULITT; RODESTA TUMBLIN; DR.
KIA JONES; MARCELEAN ARRINGTON;
VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacity as Governor of
Mississippi*; LYNN FITCH, *in her official capacity as
Attorney General of Mississippi*; MICHAEL WATSON,
*in his official capacity as Secretary of State of
Mississippi,*

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE,

Intervenor-Defendant.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI











ARTHUR JOHNSTON, CLERK

By: Sharon Powell, Deputy Clerk

CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS



PLAINTIFFS' EXHIBIT LIST






Ex. No.	Document Description	Sponsor	ID.	EVID.
2-26-2024 PTX-001	August 28, 2023 Report of William Cooper, including all exhibits and appendices thereto			X
2-26-2024 PTX-002	November 15, 2023 Rebuttal Report of William Cooper, including all exhibits and appendices thereto			X
PTX-003	Mississippi Association of Planning and Development Districts – 2022 Directory (http://mspdds.org/images/2022/2022-Directory.pdf)			
2-26-2024 PTX-004	December 22, 2023 Amended Report of Dr. Lisa Handley, including all appendices thereto			X
2-26-2024 PTX-005	August 28, 2023 Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			X
2-26-2024 PTX-006	November 27, 2023 Amended Rebuttal Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			X
2-27-2024 PTX-007	February 5, 2024 Report of Dr. Robert Luckett, including all exhibits and appendices thereto	Dr. Robert Luckett	X	
2-26-2024 PTX-008	November 14, 2023 Second Amended Report of Dr. D'Andra Orey, including all exhibits and appendices thereto			X
2-26-2024 PTX-009	November 22, 2023 Responsive Expert Report of Dr. D'Andra Orey,			X
PTX-010	January 29, 2024 Second Rebuttal Report of Dr. Jordan Ragusa, including all exhibits and appendices thereto			
PTX-011	Voter File BISG dataset used in Dr. Orey's BISG analysis, named "ms voter file bisg birdie.csv"			
3-6-2024 PTX-012	Ansolahehere, Fraga, and Schaffner (2022). <i>The Current Population Survey Voting and Registration Supplement Overstates Minority Turnout</i> , The Journal of Politics https://www.journals.uchicago.edu/doi/abs/10.1086/717260		X	
2-29-2024 PTX-013	February 5, 2024 Report of Dr. Marvin King, including all exhibits and appendices thereto	Dr. Marvin King	X	

Ex. No.	Document Description	Sponsor	ID.	EVID.
2-29-2024 PTX-014	November 15, 2023 Report of Dr. Marvin King, including all exhibits and appendices thereto	Dr. Marvin King	X	
PTX-015	Exhibit 5 to Deposition of Dr. Jordan Ragusa, <i>Old Voters, New Voters, and the Personal Vote: Using Redistricting to Measure the Incumbency Advantage</i> , American Journal of Political Science			
PTX-016	Exhibit 6 to Deposition of Dr. Jordan Ragusa, <i>Revisiting Majority-Minority Districts and Black Representation</i> , Political Research Quarterly			
PTX-017	Exhibit 7 to Deposition of Dr. Thomas Brunell, Brunell, Anderson, & Cremona 2008, <i>Descriptive Representation, District Demography, and Attitudes toward Congress Among African Americans</i> , Legislative Studies Quarterly			
3-6-2024 PTX-018	Exhibit 8 to Deposition of Dr. Thomas Brunell, Solowej, Martinek, & Brunell 2005, <i>Partisan Politics: The Impact of Party in the Confirmation of Minority and Female Federal Court Nominees</i> , Party Politics		X	
3-6-2024 PTX-019	Exhibit 10 to Deposition of Dr. Thomas Brunell, Lublin, Handley, Brunell & Grofman 2019, <i>Minority Success in Non-Majority Minority Districts: Finding the "Sweet Spot,"</i> The Journal of Race, Ethnicity, and Politics		X	
2-26-2024 PTX-020	Exhibit 16 to Deposition of Dr. Thomas Brunell, Executive Order No. 81 (June 11, 1971)			X
2-26-2024 PTX-021	Exhibit 23 to Deposition of Dr. Thomas Brunell, Ansolabehere, Schaffner, and Luks, <i>Guide to the 2020 Cooperative Election Study</i>			X
2-26-2024 PTX-022	Exhibit 24 to Deposition of Dr. Thomas Brunell, Mississippi Sample of 2020 Cooperative Election Study Data			X
2-26-2024 PTX-023	Exhibit 25 to Deposition of Dr. Thomas Brunell, Mississippi Sample			X

Ex. No.	Document Description	Sponsor	ID.	EVID.
	of 2020 Cooperative Election Study Data (Coded)			
2-26-2024 PTX-024	Exhibit 26 to Deposition of Dr. Thomas Brunell, Mississippi Sample of 2020 Cooperative Election Study Data (Coded and Sorted)			X
2-26-2024 PTX-025	U.S. Census Bureau, <i>Frequently Asked Questions (FAQs) About Voting and Registration</i> , https://www.census.gov/topics/public-sector/voting/about/faqs.html			X
3-6-2024 PTX-026	<i>Clarno v. Fagan</i> , Excerpt of Special Master's Report (Or. Circuit Ct. Nov. 5, 2021)		X	
	PTX-027 <i>Clarno v. Fagan</i> , Panel Decision (Or. Circuit Ct. Nov. 24, 2021)			
3-6-2024 PTX-028	<i>Ohio A. Philip Randolph Institute v. Householder</i> , Op. Excerpt (S.D. Ohio May 3, 2019)		X	
3-6-2024 PTX-029	<i>Common Cause v. Lewis</i> , Op. Excerpt, (NC Sup. Ct. Sept. 3, 2019)		X	
	PTX-030 <i>Szeliga v. Lamone</i> , Op. Excerpt (Md. Circuit Ct. Mar. 25, 2022)			
	PTX-031 Expert Report of Dr. Thomas Brunell, <i>Szeliga v. Lamone</i>			
3-6-2024 PTX-032	<i>Lopez v. Abbott</i> , 339 F.Supp.3d 589 (S.D. Tex. 2018) (excerpt)		X	
3-6-2024 PTX-033	<i>Flores v. Town of Islip</i> , 382 F.Supp. 3d 197 (E.D.N.Y. 2019) (excerpt)		X	
3-6-2024 PTX-034	<i>NAACP, Spring Valley Branch v. East Ramapo Central School District</i> , 462 F.Supp.3d 368 (S.D.N.Y. 2020)		X	
3-6-2024 PTX-035	<i>Alpha Phi Alpha Fraternity, Inc. v. Raffensperger</i> , 587 F.Supp.3d 1222 (N.D.Ga. 2022) (excerpt)		X	
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			

Ex. No.	Document Description	Sponsor	ID.	EVID.
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
PTX-045	SDT-SJLCRR-001330- Letter from Senator Melanie Sojourner to James F. Ted Booth – March 24, 2022			
PTX-046	Carson, E. A. “Prisoners in 2020 - Statistical Tables.” BJS.OJP.Gov. U.S. Department of Justice, https://bjs.ojp.gov/content/pub/pdf/p20st.pdf			
PTX-047	NAACP, <i>History of Lynching in America</i> , https://naacp.org/find-resources/history-explained/history-lynching-america			
PTX-048	Pittman, Ashton. “GOP Mailers Misleadingly Paint Espy as a Criminal.” JacksonFreePress.Com. Jackson Free Press, November 2, 2018. Ashton Pittman, “GOP Mailers Misleadingly Paint Espy as a Criminal,” Jackson Free Press (Nov. 2, 2018), https://www.jacksonfreepress.com/news/2018/nov/02/gop-mailers-misleadingly-paint-espy-criminal/			
PTX-049	Angelo Dagonel, Soichiro Yamauchi. 2023. “The Geography of Racially Polarized Voting: Calibrating Surveys at the District Level.” American Political Science Review https://doi.org/10.1017/S0003055423000436			
PTX-050	Chris Danielson. After Freedom Summer: How Race Realigned Mississippi Politics, 1965-1986. Gainesville: University Press of Florida, 2011, pp.173-188;			

Ex. No.	Document Description	Sponsor	ID.	EVID.
PTX-051	McMillen, Neil R. 1989. <i>Dark Journey: Black Mississippians in the Age of Jim Crow</i> . Champaign, Illinois: University of Illinois Press, p. 41-44.			
PTX-052	Equal Justice Initiative. <i>Lynching in America: Confronting the Legacy of Racial Terror</i> . 3rd Edition. https://lynchinginamerica.eji.org/report/ , pp.30-33, 39-40.			
2-26-2024 PTX-053	002057 – Public Materials from Joint Committee Meetings (SDT-SJLCRR-002057-2070)			X
2-26-2024 PTX-054	Benchmark House Data (SDT-Upchurch-000006)			X
	INTENTIONALLY LEFT BLANK			
PTX-056	“Population of the United States in 1860: Mississippi.” 1860 U.S. Census: Statistics of the United States. U.S. Census Bureau. https://www2.census.gov/library/publications/decennial/1860/population/1860a-22.pdf , p.270.			
PTX-057	State of Mississippi. Mississippi Constitution of 1890. https://www.mshistorynow.mdah.ms.gov/issue/mississippi-constitution-of-1890-as-originally-adopted .			
PTX-058	“Population of the United States at Each Census, from 1790 to 1900.” In Statistical Abstract of the United States, 1901. 24th ed. Washington: Government Printing Office, 1902, p.7			
PTX-059	Historical Statistics of the United States, Colonial Times to 1970. Chapter Y, Government, Elections and Politics. “Voter participation in presidential elections by state: 1824 to 1968. Washington: Government Printing Office, 1975, pp. 1067, 1072.			
PTX-060	Medgar W. Evers. “News and Action.” NAACP Mississippi State Office. April 11, 1958. https://www.crmvet.org/docs/5804_naap_ms_news.pdf			

Ex. No.	Document Description	Sponsor	ID.	EVID.
PTX-061	“Census of Population: 1960.” The Eighteenth Decennial Census of the United States. Volume 1: Characteristics of the Population. Part 26: Mississippi. U.S. Department of Commerce. https://www2.census.gov/library/publications/decennial/1960/population-volume-1/37745223v1p26.zip , p.viii; U.S.			
PTX-062	Frank R. Parker. Black Votes Count: Political Empowerment in Mississippi after 1965. Chapel Hill: University of North Carolina Press, 1990, p.xv, 45, 50			
PTX-063	U.S. Department of Justice Civil Rights Division. “Voting Determination Letters for Mississippi.” https://www.justice.gov/crt/voting-determination-letters-mississippi .			X
PTX-064	Letter, Acting Assistant U.S. Attorney General, Civil Rights Division, James P. Turner to John P. Fox, Esq., February 27, 1990. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2100.pdf , pp.1 and 2.			X
PTX-065	Letter, Assistant U.S. Attorney General, Civil Rights Division, Deval Patrick to Jeffery M. Navarro, December 4, 1995. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2630.pdf , pp.1, 5.			X
PTX-066	Letter, Assistant U.S. Attorney General, Civil Rights Division, Thomas E. Perez to Kenneth Dreher, Esq., and David Wade, Senior Planner, December 3, 2012. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/1_121203_0.pdf , p.2.			X
PTX-067	Isabelle Katz Pinzler, Acting Assistant Attorney General, to Sandra M. Shelson, Special Assistant Attorney General, State of Mississippi,			X

3-6-2024

3-6-2024




3-6-2024










3-6-2024









3-6-2024

Ex. No.	Document Description	Sponsor	ID.	EVID.
	September 22, 1997. https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/MS-2650.pdf			
PTX-068	World Population Review. “Black Poverty Rate by State [Updated January 2023].” https://worldpopulationreview.com/state-rankings/black-poverty-rate-by-state			
PTX-069	Article 8, Mississippi Constitution of 1868. https://mshistorynow.mdah.ms.gov/issue/mississippi-constitution-of-1868			
PTX-070	“Racial Facts.” Jackson Free Press. Jackson Free-Press, Accessed August 19, 2023. https://jacksonfreepress.media.clients.ellingtoncms.com/news/documents/2017/11/15/CC_Racial_Facts.pdf			
PTX-071	“H.R. 5905.” Congress.Gov. House of Representatives, November 5, 2021. https://www.congress.gov/bills/117th-congress/house-bill/5905/text?s=1&r=76			
PTX-072	“1948 Presidential General Election Results.” US Election Atlas.Org. Dave Leip’s Election Atlas, Accessed August 19, 2023. https://uselectionatlas.org/RESULTS/national.php?year=1948			
PTX-073	“1964 Presidential General Election Results.” US Election Atlas.Org. Dave Leip’s Election Atlas, Accessed August 19, 2023. https://uselectionatlas.org/RESULTS/national.php?year=1964			
PTX-074	“1968 Presidential General Election Results.” US Election Atlas.Org. Dave Leip’s Election Atlas, Accessed August 19, 2023. https://uselectionatlas.org/RESULTS/data.php?year=1968&datatype=national&def=1&f=0&off=0&elect=0			
PTX-075	Tilley, Brian P. 2020. “I Am the Law and Order Candidate”: A Content Analysis of Donald Trump’s Race-			



Ex. No.	Document Description	Sponsor	ID.	EVID.
	Baiting Dog Whistles in the 2016 Presidential Campaign, Psychology 11 (pp. 1941-1974).			
PTX-076	Schaffner, Brian F., Matthew Macwilliams, and Tatishe Nteta. 2018. "Understanding White Polarization in the 2016 Vote for President: The Sobering Role of Racism and Sexism," Political Science Quarterly, 133 (1): 9-34.			
PTX-077	Valentino, Nicholas A., Fabian G. Neuner, and Matthew Vandenbroek. 2018. "The Changing Norms of Racial Political Rhetoric and the End of Racial Priming," The Journal of Politics 80 (3): 757-771.			
PTX-078	Mutz, Diana C. "Status threat, not economic hardship, explains the 2016 presidential vote," Proceedings of the National Academy of Sciences, 115 (19) E4330-E4339.			
PTX-079	"Senate Bill 2113." LegiScan. LegiScan, April 30, 2021. https://legiscan.com/MS/text/SB2113/id/2546132			
PTX-080	Schaeffer, Katherine. "More than Half of States Will Recognize Juneteenth as an Official Public Holiday in 2023." Prewresearch.Org. Pew, June 9, 2023. https://www.pewresearch.org/short-reads/2023/06/09/more-than-half-of-states-now-recognize-juneteenth-as-an-official-holiday/			
PTX-081	DeeDee Baldwin, Mississippi History Now, "The First Black Legislators in Mississippi," https://mshistorynow.mdah.ms.gov/issue/first-black-legislators-mississippi			
	INTENTIONALLY LEFT BLANK			

Ex. No.	Document Description	Sponsor	ID.	EVID.
	INTENTIONALLY LEFT BLANK			
PTX-084	Statistics of the Presidential and Congressional Election of November 2, 1948. Office of the Clerk of the House of Representatives. Retrieved November 5, 2023, from https://clerk.house.gov/member_info/electionInfo/1948election.pdf			
PTX-085	Tasha S. Philpot, Daron R. Shaw & Ernest B. McGowen, Winning the Race: Black Voter Turnout in the 2008 Presidential Election, Public Opinion Quarterly, Volume 73, Issue 5, 2009, Pages 995–1022			
PTX-086	Seth McKee, M. Hood, & David Hill. (2012). Achieving Validation: Barack Obama and Black Turnout in 2008. State Politics & Policy Quarterly, 12(1), 3-22.			
PTX-087	Jacob R. Brown, 2023. The Obama effect? Race, first-time voting, and future participation. Political Science Research and Methods, 1-18.			
2-26-2024 PTX-088	2008 Mississippi Presidential Election Results: https://www.sos.state.ms.us/elections/2008/08%20Certification%20Results/CertifiedMain.asp			X
2-26-2024 PTX-089	2012 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2012General/certified%20results/President%20and%20Vice%20President.pdf			X
2-26-2024 PTX-090	2016 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2016General/Statewide%20Certified%20Results/President%20and%20Vice%20President.pdf			X

Ex. No.	Document Description	Sponsor	ID.	EVID.
2-26-2024 PTX-091	2020 Mississippi Presidential Election Results: https://sos.ms.gov/elections/electionresults/2020General/Statewide%20Certified%20Results/President%20and%20Vice%20President_AMENDED.pdf .			X
2-26-2024 PTX-092	Exhibit 6 of Deposition of Madalan Lennep, True the Vote v. Hosemann Declaration, MLC25			X
2-26-2024 PTX-093	Exhibit 7 of Deposition of Madalan Lennep, Thomas v. Bryant Declaration, MLC34			X
2-26-2024 PTX-094	Exhibit 8 of Deposition of Madalan Lennep, Election Commissioner Orientation Slide Decks, MLC07, MLC13, MLC26, MLC30			X
2-26-2024 PTX-095	Exhibit 10 of Deposition of Madalan Lennep, Voter Roll Move, Merge, and Purge, MLC28			X
2-26-2024 PTX-096	Exhibit 11 of Deposition of Madalan Lennep, ECAM Meeting Slide Decks, MLC10, MLC17, MLC29			X
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
2-26-2024 PTX-099	Exhibit 18 of Deposition of Madalan Lennep, Email with Booth and Lennep re: Reports, 1/15/19, REL0000000069			X
	INTENTIONALLY LEFT BLANK			
2-26-2024 PTX-101	Exhibit 22 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: Conference Call, 12/15/20, MS00000337			X
2-26-2024 PTX-102	Exhibit 25 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: Back in Office, 1/25/21, MS00000005			X
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			

Ex. No.	Document Description	Sponsor	ID.	EVID.
2-26-2024 PTX-105	Exhibit 28 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: 2019 Gov Race, 6/16/21, MS00000338			X
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
2-26-2024 PTX-109	Exhibit 33 of Deposition of Madalan Lennep, Emails with Collins and Lennep re: County Turnout Data, 7/20/21, MS000000002			X
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
	INTENTIONALLY LEFT BLANK			
2-26-2024 PTX-114	Exhibit 38 of Deposition of Madalan Lennep, Clarion-Ledger Article, MLC15			X
2-26-2024 PTX-115	Deposition Transcript of Kyle Kirkpatrick, Esq., taken on December 20, 2023			X
2-26-2024 PTX-116	Exhibit 3 of Deposition of Kyle Kirkpatrick, Esq., Email to Ben Collins from Madalan Lennep re: Letter is Delivered			X
2-26-2024 PTX-117	Exhibit 4 of Deposition of Kyle Kirkpatrick, Esq., <i>Election Commissioner Orientation: Introduction to the Statewide Elections Management System (SEMS)</i>			X
2-26-2024 PTX-118	Exhibit 5 of Deposition of Kyle Kirkpatrick, Esq., <i>SEMS Update – ECAM Convention 2011</i>			X
2-26-2024 PTX-119	Mississippi Code Annotated §§ 23-15-359, 23-15-851; 23-15-833; 23-15-837			X
PTX-120	Associated Press, Special Election Delayed to Fill Mississippi House Seat			X

Ex. No.	Document Description	Sponsor	ID.	EVID.
PTX-121	Order Dispensing With Special Election, September 14, 2021			
PTX-122	Sample Ballot, 2020 HD 88 Special Election			
PTX-123	Election Results, 2021 Special Elections to the Mississippi Senate			
PTX-124	Associated Press, Democrat Abe Hudson resigning from Mississippi House			
PTX-125	Writ of Election as to Senate District 32, July 14, 2021			
PTX-126	Enacted Senate District 2 with Precincts			
2-26-2024 PTX-127	Deposition Transcript of Madalan Lennep, taken on December 18, 2023	_____		X
2-29-2024 PTX-128	Marvin King CV	Dr. Marvin King		X
2-27-2024 PTX-129	Robert E. Lockett, Jr. CV	Dr. Robert Lockett		X
3-6-2024 PTX-130	<i>Nairne v Ardoin</i> , 3:22-cv-00178-SDD-SDJ, Doc. 233, Ruling and Order (excerpts)	_____	X	
PTX-131	2020 Special Election Results – HD 88, SD 15, SD 39, HD 37, HD 66			
PTX-132	2020 Special Elections Sample Ballot			
PTX-133	Clarion Ledger, Governor sets special elections in November to fill 2 empty seats in Mississippi Senate			
PTX-134	Enterprise Tocsin, Abe Hudson Resigns from House Seat, Special Election Set for Nov. 2			
PTX-135	Clarion Ledger, Mississippi Voters Head to Polls Tuesday to Fill Four Open Legislative Seats			
3-6-2024 PTX-136	Deposition Transcript of Dr. Thomas Brunell	_____	X	
3-6-2024 PTX-147	Secretary of State of Mississippi, <i>Voter Registration Drive Organizer Toolkit</i> (Nov. 2021)	_____	X	
3-6-2024 PTX-148	U.S. News, <i>Mississippi voter registration numbers remain steady heading into Tuesday's general election</i> (Nov. 2, 2023), https://apnews.com/article/election-	_____	X	

Ex. No.	Document Description	Sponsor	ID.	EVID.
	2023-mississippi-voter-registration-a4bd134bda9f9063d56952c6f3454706			
PTX-155 3-6-2024	U.S. Census Bureau, <i>Increased Margins of Error in the 5-Year Estimates Containing Data Collected in 2020</i> , https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2022-04.html		X	
PTX-156 3-6-2024	Deposition Transcript of Dr. John Alford		X	